

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

BEAUFORT DIVISION

Ruth Simmons,)	Civil Action No.: <u>9 : 08 - 3511 - SB</u>
)	
Plaintiff,)	PLAINTIFF'S RULE 26.01 ANSWERS
)	
vs.)	
)	
Beaufort, Jasper, Hampton Comprehensive Health)	
Services, Inc. a/k/a Beaufort-Jasper-Hampton)	
Comprehensive Health Services, PO Incorporated,)	
)	
Defendant.)	

The Plaintiff hereby answers Local Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Answer: None known.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Answer: Jury because the Plaintiff requests a jury trial.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Answer: Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Answer: Upon information and belief, the Defendant and its employees are deemed to be Public Health Service employees covered by 42 U.S.C. § 233 (a) for acts and omissions which occurred in this case, and the acts occurred in Beaufort County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases; arise from the same or identical transaction, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: This matter is not related to any other matter filed in this district, but this matter is related to South Carolina Civil Case Number 07-CP-07-3018 currently pending in the Beaufort County Court of Common Pleas.

HUGHEY LAW FIRM LLC

s/ D. Nathan Hughey
D. Nathan Hughey (Fed. ID 7635)
HUGHEY LAW FIRM, LLC
767 Coleman Boulevard, Unit 2
Post Office Box 348
Mount Pleasant, SC 29465-0348
Telephone: (843) 881-8644
Facsimile: (888) 884-8311
nhughey@hugheyfirm.com

Attorneys for Plaintiff

10/16, 2008
Mount Pleasant, South Carolina